

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CKR LAW LLP f/k/a CRONE KLINE RINDE,
LLP,

Petitioner,

v.

ANDERSON INVESTMENTS
INTERNATIONAL, LLC, PARAMOUNT
SERVICES LLC a/k/a PARAMOUNT
SERVICES LTD., INTECH HOLDINGS (HK)
LIMITED a/k/a INTECH INTERNATIONAL
GROUP CO. LIMITED a/k/a INTECH
HOLDINGS INC., WHITE ROCK
ELECTRONIC TRADING LLC, BMR
CONSULTING, EDMUND WHITE a/k/a
RAVI RACH, GULZHAN NAMAZBAEVA,
and SATYABRATO CHAKRAVARTY,

Respondents.

Civil Action No. 1:20-cv-07937-JSR

**DECLARATION OF MICHAEL JAMES
MALONEY IN SUPPORT OF REQUEST
for CLERK'S CERTIFICATE OF
DEFAULT**

I, Michael James Maloney, hereby declares as follows:

1. I represent Petitioner CKR Law LLP f/k/a Crone Kline Rinde, LLP (“Petitioner”) in this action.

2. This action was commenced pursuant to a Petition to Compel Arbitration filed on September 25, 2020 (Dkt. 1).

3. The time for defendants, Anderson Investments International, LLC, Paramount Services LLC a/k/a Paramount Services Ltd., Intech Holdings (HK) Limited a/k/a Intech International Group Co. Limited a/k/a Intech Holdings Inc., White Rock Electronic Trading LLC, BMR Consulting, Edmund White a/k/a Ravi Rach, Gulzhan Namazbaeva, and Satyabrato Chakravarty (altogether, “Respondents”), to answer or otherwise move with respect to the Petition herein has expired.

4. That Respondents have not answered or otherwise moved with respect to the Petition, and the time for Respondents to answer or otherwise move has not been extended.

5. That none of the Respondents are infants or incompetent persons. Respondents are not presently in the military service of the United States as appears from facts in this litigation.

WHEREFORE, Petitioner requests that the default of Respondents be noted and a certificate of default issued.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief.

Dated: New York, New York
May 12, 2021

Respectfully submitted,

FELICELLO LAW P.C.

By: /s/ Michael James Maloney

Michael James Maloney

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*Attorneys for Petitioner CKR Law LLP f/k/a
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